

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
JESSICA DAVIDSON, ESQ.**

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”). I make this Certification based on personal knowledge and in support of ZHP’s Memorandum of Law in Opposition to Plaintiffs’ Motion to Compel WeChat Production.

2. Attached hereto as Exhibit 1 is a true and correct copy of an August 24, 2023 Email re: WeChat.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Yong Zhou, dated October 3, 2023. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order. Additionally,

Exhibits 1 and 2 to the declaration have been filed under seal because they contain PROTECTED INFORMATION.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Declaration of Frances Chen, dated October 5, 2023.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Declaration of Rogier Creemers, Ph.D., dated October 6, 2023.

6. Attached hereto as Exhibit 5 is a true and correct copy of the relevant excerpts from the May 12, 2021 transcript of the deposition of Yuelin Hu.*

7. Attached hereto as Exhibit 6 is a true and correct copy of a translation of Exhibit P (ZHP00266273) to plaintiffs' memorandum in support of their motion to compel.*

8. Attached hereto as Exhibit 7 is a true and correct copy of a translation of Exhibit S (ZHP00784268) to plaintiffs' memorandum in support of their motion to compel.*

9. Attached hereto as Exhibit 8 is a true and correct copy of a translation of Exhibit I (ZHP00641169) to plaintiffs' memorandum in support of their motion to compel.*

* Filed under seal because it contains information that has been designated as "PROTECTED INFORMATION" as defined in the Protective Order.

10. Attached hereto as Exhibit 9 is a true and correct copy of a translation of Exhibit R (PRINSTON00444698) to plaintiffs' memorandum in support of their motion to compel.*

11. Attached hereto as Exhibit 10 is a true and correct copy of a translation of Exhibit T (ZHP00271592) to plaintiffs' memorandum in support of their motion to compel.*

12. Attached hereto as Exhibit 11 is a true and correct copy of a translation of Exhibit U (ZHP01820729) to plaintiffs' memorandum in support of their motion to compel.*

13. Attached hereto as Exhibit 12 is a true and correct copy of ZHP02394113.*

14. Attached hereto as Exhibit 13 is a true and correct copy of a translation of ZHP02394113.*

15. Attached hereto as Exhibit 14 is a true and correct copy of a translation of Exhibit Q (PRINSTON00485884) to plaintiffs' memorandum in support of their motion to compel.*

* Filed under seal because it contains information that has been designated as "PROTECTED INFORMATION" as defined in the Protective Order.

Dated: October 6, 2023

Respectfully submitted,

By: /s/ Jessica Davidson

Jessica Davidson (NY Bar No.
6034748)

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

One Manhattan West

New York, New York 10001

Phone: (212) 735-3222

Fax: (917) 777-3222

jessica.davidson@skadden.com

Attorney for Zhejiang Huahai

Pharmaceutical Co., Ltd., Huahai

U.S., Inc., Princeton Pharmaceutical

Inc., and Solco Healthcare U.S., LLC